

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas  
FILED

March 28, 2025

United States of America

v.

Tadeo Pedro-Torres

Case No.

4:25-mj-0186

Nathan Ochsner, Clerk of Court

*Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 28, 2024 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

18 U.S.C. § 1001

*Offense Description*

Tadeo Pedro-Torres did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, namely the United States Department of Health and Human Services by intentionally and willfully stating that he was a minor, when in truth and fact he is an adult.

This criminal complaint is based on these facts:

See Attached Affidavit in support of the Criminal Complaint

☒ Continued on the attached sheet.

  
complainant's signature  
Shawna Campbell, ICE Deportation Officer  
Printed name and title

Sworn to me telephonically.

Date: 03/28/2025

  
Judge's signature

City and state: Houston, Texas

Hon.Dena H. Palermo, United States Magistrate Judge  
Printed name and title

**4:25-mj-0186**

**AFFIDAVIT**

(1) I am a Deportation Officer with the United States Immigration and Customs Enforcement (“ICE”) and have served in that capacity since September 2016. Prior to this assignment, I have held the following positions: Immigration Enforcement Agent and a Federal Correctional Officer. My law enforcement career began on January 7, 2007, as a Federal Correctional Officer. I have over 10 years of immigration law enforcement experience.

(2) On October 26, 2024, Tadeo Pedro-Torres was encountered by Border Patrol near El Paso, Texas. During his initial encounter, Pedro-Torres stated that his name was Tadeo Pedro-Torres, and his date of birth is November 11, 2007, making him a 17-year-old male.

(3) On October 27, 2024, the Defendant was placed into the custody of U.S. Department of Health and Human Services, Office of Refugee Resettlement (“DHHS”) and transported to Catholic Charities Houston – Autrey by Loyal Source Contractors.

(4) Under the law, DHHS holds custody and is responsible for providing care to each unaccompanied minor, defined as a child who has no lawful immigration status in the United States, has not reached 18 years of age, and, with respect to whom, there is no parent or legal guardian available in the United States to provide care and physical custody, as outlined in 6 U.S.C. § 279(g)(2).

(5) On October 28, 2024, Pedro-Torres stated that his date of birth was November 11, 2007, to DHHS Representative Sallis Estrada during his intake interview at Catholic Charities Houston Autrey Shelter.

(6) To verify Pedro-Torres’s name and date of birth, his sister provided a birth certificate bearing the name Tadeo Pedro-Torrez, born in San Mateo, Ixtatan, Huehuetenango, Guatemala.

(7) On December 2, 2024, Pedro-Torres’s birth certificate was sent to the Guatemalan consulate for verification and was identified as being fraudulent.

(8) The Guatemalan consulate confirmed that Pedro-Torres’s true and correct name is Tadeo Pedro-Torres and correct date of birth is June 18, 2003. At the time of discovery, Pedro-Torres was twenty-one years of age.

(9) On December 4, 2024, Pedro-Torres, submitted an Age Self-Attestation acknowledging that his correct name is Tadeo Pedro-Torres and his date of birth is January 18, 2003.

(10) It was determined that Pedro-Torres was, in fact, an adult posing as a minor, a determination made upon the consulate's provision of an authenticated birth certificate for Pedro-Torres and defendant's Age Self-Attestation.


(11) Based on the information contained in ICE's records, as detailed below, and my training and experience, I submit that there exists probable cause to believe that the Defendant has violated 18 U.S.C. § 1001.



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Shawna Campbell, Deportation Officer  
United States Department of Homeland Security  
U.S. Immigration & Customs Enforcement

Signed and sworn telephonically before me on this 28<sup>th</sup> day of March 2025, and I find probable cause.



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Honorable Judge Dena H. Palermo  
United States Magistrate Judge  
Southern District of Texas